

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
District of Delaware

United States of America

v.

CHARLES JOBE

Case No.

14 - 85 M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 6, 2014 in the county of New Castle in the  
District of Delaware, the defendant(s) violated:

Code Section

18 U.S.C. § 111

Offense Description

Assault on a Federal Officer

This criminal complaint is based on these facts:

See Affidavit.

☒ Continued on the attached sheet.

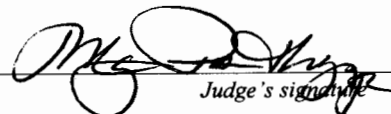
  
Complainant's signature

Joaquin Balaguer, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/06/2014

  
Judge's signature

City and state: Wilmington, Delaware

Hon. Mary Pat Thyng, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**UNITED STATES OF AMERICA**

v.

**CHARLES JOBE,**

Defendant.

Criminal Action No. 14 – 85m

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Joaquin Balaguer of the Federal Bureau of Investigation (“FBI”), assert that the following information is true to the best of my knowledge, information, and belief:

**INTRODUCTION AND BACKGROUND OF AFFIANT**

1. I have been employed by the FBI as a Special Agent since August 2010. I am currently assigned to the Baltimore Field Office of the FBI, in Wilmington, Delaware. I participated in new agent training at the FBI Academy in Quantico, Virginia. While employed by the FBI, I have investigated federal criminal violations related to gangs, bank robbery, drug trafficking, firearms trafficking, kidnapping, and fugitives. I have actively participated in investigations of criminal activity, including but not limited to the investigation of violent crime. During these investigations, I have also participated in the execution of search warrants and the seizure of evidence relating to violent crime. As an agent of the FBI, I have testified under oath, affirmed applications of search and arrest warrants, and participated in and gained experience in Title III wiretap investigations for the enforcement of federal laws. As a Special Agent of the FBI, I have personally

conducted, supervised, and participated in investigations which have resulted in the arrest and convictions of numerous individuals responsible for committing violent crimes. I have been the affiant on search warrants and I have monitored electronic tracking devices and monitoring equipment.

2. I am one of the case agents responsible for the investigation in aid of which this application is being made. Unless otherwise stated, the information in this affidavit is based upon my own personal knowledge and my conversations with other law enforcement officers. Because this affidavit is solely for the purpose of establishing probable cause, not all facts relating to the investigation are included herein.

#### **THE SPECIFIED FEDERAL OFFENSE**

3. Pursuant to Title 18, United States Code, Section 111, it is unlawful for any person to forcibly assault, resist, oppose, impede, intimidate, or interfere with any officer or employee of the United States or of any agency in any branch of the United States Government, while that officer or employee is engaged in or on account of the performance of official duties.

#### **FACTS IN SUPPORT OF PROBABLE CAUSE**

4. At approximately 2:47 p.m. on June 6, 2014, an individual later identified as CHARLES JOBE drove a vehicle into the parking lot of the Wilmington Veterans Affairs Medical Center in Elsmere, Delaware and parked in that lot. He was alone in the vehicle. He then got out of his vehicle and walked around the parking lot and its surroundings for approximately fifteen (15) minutes. In his hand was a black handgun. Uniformed law enforcement officers employed by United States Department of Veterans Affairs

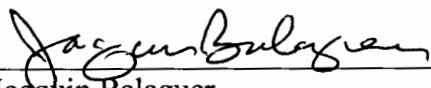
approached him and directed him to drop the handgun. JOBE did not obey their commands. Shortly thereafter, JOBE pointed the handgun directly towards the officers. At that point, in fear for their lives, one of the officers fired two shots at JOBE. One of those shots struck JOBE in the hand. Officers then directed JOBE to discard his handgun, at which point JOBE threw his weapon to the ground and was taken into custody. Your affiant has reviewed video surveillance of these events.

5. All of the officers on scene at the time of the shooting were officers employed by United States Department of Veterans Affairs.

### CONCLUSION

WHEREFORE, based on the foregoing factual information, your affiant avers there is probable cause to believe that CHARLES JOBE has violated Title 18, United States Code, Section 111 and respectfully requests that the Court issue a criminal complaint charging that offense.

Respectfully submitted,

  
\_\_\_\_\_  
Joaquin Balaguer  
Special Agent, FBI

Sworn to and subscribed in my presence  
this 6<sup>th</sup> day of June 2014.

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF DELAWARE